

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARK WALTERS

Plaintiff,

V.

OpenAI, L.L.C.,

Defendant.

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Civil Action No. 1:23-cv-03122-
MLB

DEFENDANT OPENAI'S MOTION TO DISMISS

Defendant OpenAI, L.L.C. (“OpenAI”), by and through the undersigned attorneys, files this Motion to Dismiss Plaintiff Mark Walters’s Complaint pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6). For the reasons set forth in OpenAI’s Memorandum of Law in Support of this Motion, filed contemporaneously herewith, OpenAI respectfully requests that the Complaint be dismissed in its entirety with prejudice.

Dated: July 21, 2023

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pending
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pending
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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of July 2023, I electronically filed the foregoing Motion to Dismiss and Memorandum of Law in Support with the Clerk of Court using the CM/ECF system, which will send e-mail notification of such filing to all attorneys of record.

Dated: July 21, 2023

By: /s/ Brendan Krasinski
Brendan Krasinski